

SPEARS & IMES LLP

767 Third Avenue
New York, NY 10017
tel 212 213-6996
fax 212 213-0849

Max Nicholas
tel 212-213-1715
mnicholas@spearsimes.com

August 4, 2022

Application GRANTED.

BY ECF

SO ORDERED.

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Date: August 5, 2022


P. Kevin Castel
United States District Judge

Re: *United States v. Andrew Brown*, S1 20 Cr. 470 (PKC)

Dear Judge Castel:

We respectfully write on behalf of Andrew Brown to request a temporary modification of the travel restrictions that are part of his bail conditions in the above-captioned case. The Pretrial Services Officer supervising Mr. Brown has no objection to this request, provided Mr. Brown provides her with an itinerary when he travels and continues to check in with her as previously scheduled. We contacted the Government on August 2 concerning this request but have not received a response.

Mr. Brown respectfully requests that the restrictions on his travel be modified so that he may travel to the Northern District of New York during the months of August and September. Mr. Brown's father will be undergoing surgery in Albany, New York, on August 8. Mr. Brown hopes to drive his father from his father's home in Massachusetts to Albany for the surgery, and then to return periodically to Albany to assist his father as he recovers and undergoes follow-up treatment.

Under Mr. Brown's bail conditions, he is permitted to travel to the Southern and Eastern Districts of New York and the District of Connecticut, as well as to the District of Massachusetts and the Eastern District of Virginia for the purpose of visiting family. (ECF Nos. 49, 60.) The Court has also permitted Mr. Brown to make specific requests, to be considered on a case-by-case basis, to travel to the District of New Jersey and the Northern District of New York. (ECF No. 60.)

Hon. P. Kevin Castel

- 2 -

In light of the foregoing, we respectfully request that Mr. Brown's bail conditions be modified to allow him to travel to the Northern District of New York during August and September in order to assist his father with his recovery from surgery.

Respectfully submitted,

/s
Max Nicholas
Reed M. Keefe
Attorneys for Andrew Brown

cc: All Counsel via ECF